

Annual Maintenance Activity Compliance Review Plan Highway and Roadside Activity



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**Department of Transportation
Sacramento, California**

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Activity Site	Maintenance Highway and Roadside Activity Site
AMACRP	Annual Maintenance Activity Compliance Review Plan
BMP	Best Management Practice
Caltrans	California Department of Transportation
DMSWC	District Maintenance Storm Water Coordinator
FY	Fiscal year
Guidelines	Storm Water Quality Practices Guidelines
Maintenance	Caltrans Maintenance Division
NOV	Notice of Violation
NPDES	National Pollutant Discharge Elimination System
Permit	NPDES Permit for Storm Water Discharges from the State of California, Dept. of Transportation Properties, Facilities and Activities (Order No. 99-06- DWQ, Permit No. CA5000003)
RWQCB	Regional Water Quality Control Board
SWMP	Caltrans Statewide Storm Water Management Plan
SWRCB	State Water Resources Control Board

The Annual Maintenance Activity Compliance Review Plan (AMACRP) describes the program that has been implemented by the Caltrans Compliance Review Team for the Maintenance Program. This AMACRP has been prepared in accordance with the current approved Caltrans *Statewide Storm Water Management Plan (SWMP)*, to comply with the water pollution control requirements of the *National Pollutant Discharge Elimination System (NPDES) Permit for Storm Water Discharges from the State of California, Department of Transportation (Caltrans) Properties, Facilities, and Activities (Order No. 99-06-DWQ), Permit No. CAS000003* (Caltrans Permit). The AMACRP will be updated to be consistent with the approved SWMP and its revisions. The AMACRP provides Caltrans with the information necessary to ensure that the appropriate level of storm water pollution control is being achieved at Caltrans maintenance activities. This AMACRP will be made available to the State Water Resources Control Board (SWRCB) and Regional Water Quality Control Boards (RWQCBs).

Compliance Review Team's activities will focus on achieving the following objectives:

- Evaluate compliance of Activity Sites statewide with the requirements of the Permit;
- Report compliance status to Caltrans' management; and
- Evaluate Best Management Practice (BMP) implementation trends, suggest areas for improvement and new BMP implementation methodologies.

This AMACRP describes the compliance evaluation criteria, protocols, and reporting methods for the first year of the compliance review program. The key elements of the AMACRP include:

- Activity Site selection criteria and review frequency (Section 3.0)
- Activity Site review criteria, methodology and ratings (Section 4.0)
- Compliance review and reporting protocol (Section 5.0)
- Feedback and program improvement (Section 6.0)

The site selection criteria section describes which Activity Sites are to be reviewed and frequency of the compliance review during FY 2004/2005. The initial selection of Activity Sites for compliance review will be based on the following hierarchy and selection criteria:

Number of Inspections

- **Minimum of 10 Inspections per District.** There are 12 Maintenance Districts with varying maintenance activities. A minimum of 10 inspections will be performed in each district. As time and budget allows, more inspections will be performed, focusing on the busier districts.

Activity Selection

- **Notice of Violations (NOVs).** Initial focus will include the types of highway and roadside activities that have received NOVs. Previous NOVs (statewide) will be reviewed and any activity with a previous NOV will be given highest priority in scheduling inspections.
- **Activity Sites located near environmentally sensitive areas or near receiving waters in each District.** Preference will also be given to monitoring compliance of maintenance activities located near environmentally sensitive areas or near receiving waters in each District. However, reviews will not focus on one area, but will be dispersed geographically as feasible.
- **Duration and size of the highway and roadside activity.** In general, Maintenance work crews comprised of a small crew perform maintenance activities in a short time period (most requiring no more than one day), and minimal soil is disturbed. Preference will be given to activities of longer duration or soil disturbances.

Activity Sites will be reviewed for overall effectiveness of their storm water pollution prevention implementation and their potential for pollutant discharge. The Maintenance BMPs to be reviewed will generally include the following activities:

Asphalt Cement Crack and Joint Grinding/Sealing

Asphalt Paving

Structural Pavement Failure (Digouts) Pavement Grinding and Paving

Emergency Pothole Repairs

Sealing Operations

Portland Cement Crack and Joint Sealing

Mudjacking and Drilling

Concrete Slab and Spall Repair

Shoulder Grading

Nonlandscaped Chemical Vegetation Control

Nonlandscaped Mechanical Vegetation Control/Mowing

Nonlandscaped Tree and Shrub Pruning Brush Chipping Tree and Shrub Removal

Fence Repair

Drainage Ditch and Channel Maintenance

Drain and Culvert Maintenance

Curb and Sidewalk Repair

Sweeping Operations

Litter and Debris Removal

Emergency Response and Cleanup Practices

Graffiti Removal

Chemical Vegetation Control

Manual Vegetation Control

Landscaped Mechanical Vegetation Control/Mowing

Landscaped Tree and Shrub Pruning (E2b), Brush Chipping (E2c), Tree and Shrub Removal (E2d)

Irrigation Line Repairs

Irrigation (Watering), Potable and Nonpotable

Roadside Slope Inspection

Roadside Stabilization

Storm Water Treatment Devices

Traction Sand Traps

Storm Drain Stenciling

Public Facilities

Welding and Grinding

Sandblasting, Wet Blast with Sand Injection and Hydroblasting
Painting
Bridge Repairs
Draw Bridge Maintenance

Pump Station Cleaning
Tube and Tunnel Maintenance and Repair
Lane Scrubbing Operations
Tow Truck Operations
Ferry Operations

Sawcutting for Loop Installation

Thermoplastic Striping and Marking
Paint Striping and Marking
Raised/Recessed Pavement Marker Application and Removal
Sign Repair and Maintenance
Median Barrier and Guard Rail Repair
Emergency Vehicle Energy Attenuation Repair

Snow Removal
Ice Control

Minor Slides and Slipouts Cleanup/Repair

Building and Grounds Maintenance
Storage of Hazardous Materials (Working Stock)
Material Storage Control (Hazardous Waste)
Outdoor Storage of Raw Materials
Vehicle and Equipment Fueling
Vehicle and Equipment Cleaning
Vehicle and Equipment Maintenance and Repair
Aboveground and Underground Tank Leak and Spill Control

The compliance reviews will be conducted year-round. Compliance will be documented on a standardized Maintenance Activity Compliance Inspection Summary (Inspection Summary) presented in Attachment 1.

4.1 REVIEW CRITERIA

Compliance reviews will be conducted to at minimum of 10 Activity Sites per District. The Compliance Review Team will coordinate with each District Maintenance Storm Water Coordinator (DMSWC) on establishing inspection activities and dates in the respective District.

Each DMSWC will then be responsible for providing a minimum of 48 hours notice in advance of the upcoming review to District management.

4.2 REVIEW METHODOLOGY

A Compliance Review Team inspector will conduct the review at each Activity Site. It is anticipated that multiple Activity Sites will be inspected each day depending on distance between Activity Sites and the duration or complexity of the activity. Initially, the Compliance Review Team inspectors will conduct reviews together to develop a consistent rating approach. Following the initial period, the inspectors may conduct individual reviews because of logistical constraints.

During each inspection, the Compliance Review Team inspector will use the Inspection Summary to document and rate the compliance status of the Activity Site. The inspector will then review the ratings with the DMSWC and the Maintenance Supervisor or other Caltrans representative at the end of the inspection.

4.3 RATING GUIDELINES

At the end of each inspection, an Activity Site rating will be provided to the Maintenance Supervisor. The rating will reflect the overall NPDES storm water compliance of the Activity Site and the effectiveness of BMPs implementation. Ratings will consist of an alphanumeric designation according to the following guidelines (See Attachment 2 for more detailed descriptions of ratings).

Maintenance Highway and Roadside Activity Site Compliance (Numeric Designation):

1. The Activity Site is in compliance with SWMP requirements. A revisit will not be necessary.
2. Minor deficiencies noted. The Activity Site is in compliance with SWMP requirements. A revisit will not be necessary.
3. A Major deficiency was noted that requires prompt correction. The activity crew will be required to attend a BMP tailgate meeting focusing on BMPs for the activity that was inspected. The Maintenance Supervisor must hold the meeting and submit an attendance record to the DMSWC within *2 weeks* of the inspection. The District Storm Water personnel will be notified.
4. A Critical deficiency was noted that requires immediate correction. The activity crew will be required to attend a BMP tailgate meeting focusing on the BMPs for the activity that was inspected. The Maintenance Supervisor must hold the meeting and submit an attendance record to the DMSWC within *one week* of the inspection. The DMSWC, District Managers, Environmental, and Headquarters Maintenance Storm Water personnel will be notified.

Overall Effectiveness (Alphabetic Designation):

- A. The overall water pollution prevention effort is highly effective. Storm water pollutants are substantially controlled.
- B. The overall water pollution prevention effort is moderately effective. Storm water pollutants are partially controlled.
- C. The overall water pollution prevention effort is ineffective. Storm water pollutants are not controlled.

Compliance review reports and rating results, including completed Inspection Summaries, will be provided to the Maintenance Supervisor or designee and the DMSWC who attends the review before leaving the Activity Site. District Maintenance Managers and District Maintenance Superintendents are invited to participate in the reviews. When applicable, the DMSWC or NPDES Coordinator (duty may vary by district) will notify the RWQCB pursuant to the SWMP.

6.1 DISTRICT STATUS REPORT

On a weekly basis, a summary of compliance review activities will be provided via electronic mail (email) to the Headquarters Maintenance management for distribution to District Maintenance Supervisors, Superintendents, and Managers. The summary includes an up-to-date listing of all Activity Sites inspected during the previous week, the Activity Site compliance ratings, a description of the Activity Sites identified as having major or critical deficiencies, and other issues of note. District and Headquarters Management will have the opportunity to make comments on the weekly findings. These comments will be used to guide the Compliance Review Team to continually improve the inspection program and will be included in the Year-End Performance Report.

6.2 MAINTENANCE PROGRAM MEETINGS

At the request of District and Headquarters personnel, District Maintenance Managers, or District Maintenance Storm Water Coordinator, the Compliance Review Team will present a briefing on field observations and discuss the findings of recent compliance reviews. These briefings will serve as a management tool for the District and will provide feedback to Headquarters Maintenance Storm Water personnel for storm water program improvement. In addition, the Compliance Review Team will be available to participate in the quarterly District Maintenance Storm Water Coordinator meetings to discuss the results and findings of the compliance reviews.

YEAR-END PERFORMANCE REPORT

A Year-End Performance Report summarizing the Activity Site inspection program of the prior year (FY 2004/2005) will be prepared. Following are explanations of Activity Site selection and review criteria for Activity Sites inspected during the period:

- An explanation of the Activity Site selection and review criteria for highway and roadside activities inspected during the period.
- Continuous training derived from activity inspections, including the Maintenance Storm Water Pollution Prevention Bulletins published for the period, overall performance assessment, and BMP effectiveness.
- Overall performance assessment, including a compilation of all ratings received during the cycle, individual BMP effectiveness and BMP implementation evaluation, and a comparison with the results of the previous year.
- BMP implementation trends, including observations of good water pollution control practices and challenges encountered.
- A list of overall challenges and recommended approved BMP corrected actions to improve water pollution control.
- An attachment containing an inspection summary of the numbers of maintenance activities reviewed and ratings.

ATTACHMENT 1

Maintenance Activity
Storm Water Compliance Inspection Summary

ATTACHMENT ONE *Maintenance Activity Compliance Inspection Summary*

[illegible]

ATTACHMENT ONE *Maintenance Activity Compliance Inspection Summary*

[illegible]

ATTACHMENT 2

Compliance Review

Rating Guidelines and Procedures

Activity Sites maintained by Caltrans will receive a compliance review rating using an alphanumeric rating criterion. The rating reflects the overall NPDES compliance of the Activity Site and the effectiveness of BMPs used at the Activity Site.

Numeric Rating: Activity Site Compliance

1 Rating The Activity Site is in compliance with SWMP requirements. Revisit will not be necessary.

- No observed activities that could contribute to a non-storm water discharge.

2 Rating Minor deficiencies noted. The Activity Site is in compliance with SWMP requirements. Revisit will not be necessary.

- Minor problems with a little likelihood the deficiency would result in non-storm water discharges (e.g., work areas are dry with rain events unlikely but need sweeping, some litter and small fluid spots need cleanup and removal).
- Minor waste management and storage problems that do not result in non-storm water discharges (e.g., solid waste storage inadequate or exposed to future rainfall).

3 Rating A Major deficiency was noted that requires prompt correction. The Activity crew will be required to attend a BMP tailgate meeting focusing on BMPs for the Activity that was inspected. The Maintenance Supervisor must hold the meeting and submit an attendance record to the DMSWC within 2 weeks of the inspection. The District Storm Water personnel will be notified.

- Potential non-storm water discharge. Impact to storm water runoff is high or large spills or releases threatening drain inlets and watercourses (e.g., work areas are dry but rain event approaching and deficiencies may affect storm water run-off).
- Multiple deficiencies described in the “2” rating, which cannot be corrected prior to the end of the work day or impact to storm water.

4 Rating A Critical deficiency was noted that requires immediate correction. The Activity crew will be required to attend a BMP tailgate meeting focusing on the BMPs for the Activity that was inspected. The Maintenance Supervisor must hold the meeting and submit an attendance record to the DMSWC within one week of the inspection. The DMSWC, District Managers, Environmental, and Headquarters Maintenance Storm Water personnel will be notified.

- A non-storm water discharge observed.

Note: For ratings of 3 or 4, comments are required on the Compliance Inspection Summary describing the deficiencies.

Alphabetic Rating: BMP Effectiveness

A Rating Overall implementation of BMPs is highly effective.

- BMPs are implemented and maintained in good condition.
- Some minor deficiencies with the implemented BMPs.

B Rating Overall implementation of BMPs is moderately effective.

- Some BMPs are not fully or properly maintained.
- Improper implementation of some BMPs.
- Some BMPs have not been implemented.

C Rating Major and critical deficiencies in the overall implementation of BMPs.

- Many BMPs are improperly implemented.
- BMPs have failed due to non-maintenance.
- Many BMPs are not implemented.